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Christen, Ying (Vivian) Liu, and Ellen Pao*

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

CODY WILHITE, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

EXPENSIFY, INC., et al.,  
Defendants.

Case No. 3:23-cv-01784-JR

**JOINT PROPOSED CASE  
MANAGEMENT SCHEDULE**

Pursuant to the Order Granting the Parties’ Stipulated Motion for Extension of Time (ECF No. 31), Lead Plaintiff Aleem Kanji (“Plaintiff”) and Defendants Expensify, Inc. (“Expensify” or the “Company”), David Barrett, Ryan Schaffer, Blake Bartlett, Robert Lent, Anu Muralidharan, Jason Mills, Daniel Vidal, Timothy Christen, Ying (Vivian) Liu, and Ellen Pao (collectively, the “Individual Defendants” and together with Expensify, the “Expensify Defendants”), and J.P. Morgan Securities LLC, Citigroup Global Markets Inc., BofA Securities, Inc., Piper Sandler & Co., Citizens JMP Securities, LLC, and Loop Capital Markets LLC (collectively, the “Underwriter Defendants,” and together with Plaintiff and the Expensify Defendants, the “Parties”) hereby submit this Joint Proposed Case Management Schedule to the Court.

Counsel for the Parties have met and conferred regarding a schedule for discovery and briefing through trial. Under the Private Securities Litigation Reform Act of 1995 (“PSLRA”), all discovery and other proceedings in this action were stayed during the pendency of Defendants’ Motion to Dismiss the Amended Class Action Complaint for Violation of Federal Securities Laws (ECF No. 53). Based on the undersigned counsel’s experience with cases of similar complexity and cases involving claims under the federal securities laws and subject to the PSLRA, the Parties believe that the following case schedule is reasonable and appropriate.

<b>EVENT</b>	<b>JOINT REQUESTED DATE</b>
Parties to complete Rule 26(f) discussions	April 14, 2025
Last Day for Defendants to File Answer to Amended Complaint	April 21, 2025
Last Day for Parties to Exchange Initial Disclosures	May 7, 2025
Substantial Completion of Document Productions	December 1, 2025
Last Day to File Plaintiffs’ Motion for Class Certification (including any supporting expert reports)	January 16, 2026
Last Day to File Defendants’ Opposition to Plaintiffs’ Motion for Class Certification (including any supporting expert reports)	April 3, 2026
*The parties anticipate they will be deposing affirmative class cert experts during this time	

EVENT	JOINT REQUESTED DATE
Last Day to File Plaintiffs' Reply in Support of Class Certification Motion	May 15, 2026
*The parties anticipate they will be deposing opposing class cert experts during this time	
End of Fact Discovery	June 30, 2026
Last Day to Serve Initial Expert Reports	July 31, 2026
Last Day to Serve Rebuttal Expert Reports	August 28, 2026
Expert Discovery Cut-Off (including hearing of discovery motions)	September 30, 2026
Last Day to File Dispositive and Daubert Motions	October 30, 2026
Final Pretrial Conference	April 5, 2027
Trial	May 5, 2027

DATED: April 7, 2025

Respectfully submitted,

FOSTER GARVEY PC

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*Lead Counsel for Aleem Kanji*

**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing Joint Proposed Case Management Schedule. Pursuant to L.R 11-1(b) regarding signatures, I, Eryn Karpinski Hoerster, attest that concurrence in the filing of this document has been obtained.

DATED: April 7, 2025

/s/ Eryn Karpinski Hoerster  
Eryn Karpinski Hoerster